

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

UNITED STATES OF AMERICA

v.

CRIMINAL NO. **3:24CR38-DPJ-LGI**

PAUL ANTHONY ROBINSON,
SARAH ELIZABETH CALDERON, and
JOSHANIQUE ELOUISE BAILEY

18 U.S.C. § 1349
18 U.S.C. § 1343
18 U.S.C. § 1028A

The Grand Jury charges:

COUNT 1

Introduction

At all times relevant to this Indictment:

1. Defendant **PAUL ANTHONY ROBINSON** (“**ROBINSON**”) was a resident of Louisiana.
2. Defendant **SARAH ELIZABETH CALDERON** (“**CALDERON**”) was a resident of Louisiana.
3. Defendant **JOSHANIQUE ELOUISE BAILEY** (“**BAILEY**”) was a resident of Louisiana.
4. Mac Haik Ford (“the dealership”) was a dealer of automobiles located in Jackson, Mississippi.
5. A number of banks provided financing for customers who purchased vehicles from the dealership.
6. To initiate the credit review process, dealership employees sent information about potential customers to RouteOne LLC (“RouteOne”) via the Internet.

7. After aggregating information about potential customers, RouteOne sent information electronically to finance sources.

8. RouteOne maintained servers in Nevada and did not maintain any servers in Mississippi.

9. Mac Haik Ford's servers are maintained in Jackson, Mississippi.

The Conspiracy and Scheme and Artifice to Defraud

10. Beginning as early as May 2023, and continuing through on or about June 13, 2023, in the Northern Division of the Southern District of Mississippi and elsewhere, the defendants, **PAUL ANTHONY ROBINSON, SARAH ELIZABETH CALDERON, JOSHANIQUE ELOUISE BAILEY**, and others known and unknown to the Grand Jury, did willfully and knowingly combine, conspire, confederate, and agree to devise a scheme and artifice to defraud and to obtain money and property from Mac Haik Ford by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing or attempting to execute the scheme and artifice to defraud, caused writings, signals, and sounds to be transmitted by means of wire communications in interstate commerce, in violation of Title 18, United States Code, Section 1343.

Manner and Means of the Conspiracy and Scheme to Defraud

11. It was part of the conspiracy and scheme to defraud that defendants **ROBINSON, CALDERON**, and coconspirators obtained from an unknown source or sources means of identification belonging to a real individual who had not consented to the use of her identifiers by **ROBINSON** or **CALDERON**.

12. It was further part of the conspiracy and scheme to defraud that **ROBINSON, CALDERON**, and coconspirators used the means of identification of the identity theft victim to

obtain false identification documents containing the victim's means of identification and bearing **CALDERON'S** picture, or otherwise aided and abetted such conduct.

13. It was further part of the conspiracy and scheme to defraud that **ROBINSON, CALDERON, BAILEY**, and coconspirators visited Mac Haik Ford of Jackson, where **CALDERON** presented a fraudulent driver's license to the finance manager for the purchase of a vehicle listed at \$65,995.00, or otherwise aided and abetted such conduct.

14. It was further part of the conspiracy and scheme to defraud that **ROBINSON, CALDERON, BAILEY**, and coconspirators applied for financing to purchase a vehicle using the victim's means of identification, or otherwise aided and abetted such conduct.

Acts in Furtherance of the Conspiracy and Scheme to Defraud

15. On various dates in or about and between May 2023 and June 14, 2023, the defendants and others known and unknown to the Grand Jury committed and caused to be committed the following acts, among others, in furtherance of the conspiracy and scheme to defraud:

16. At some date before on or about June 14, 2023, **ROBINSON** obtained means of identification of K.C., a Texas resident, and fraudulently procured a Texas driver's license containing K.C.'s information and **CALDERON'S** photograph.

17. On or about June 14, 2023, **ROBINSON** sent **CALDERON** a text message containing the Personal Identifiable Information (PII) of K.C. as well as additional fraudulent biographical details.

18. **ROBINSON, CALDERON, BAILEY**, and coconspirators caused the dealership to submit the stolen and fraudulent PII electronically to RouteOne to initiate a credit check for financing a vehicle.

19. On or about June 14, 2023, **ROBINSON, CALDERON, BAILEY**, and coconspirators attempted to purchase a 2022 Acura MDX from the dealership by having **CALDERON** pose as K.C., use the fraudulent K.C. license, and submit a credit application using K.C.'s means of identification.

All in violation of Title 18, United States Code, Section 1349.

COUNT 2

20. Paragraphs 1 through 19 are hereby re-alleged and incorporated herein by reference.

21. On or about June 14, 2023, in the Northern Division of the Southern District of Mississippi and elsewhere, the defendant, **SARAH ELIZABETH CALDERON**, and others known and unknown to the Grand Jury, for the purpose of executing and attempting to execute the scheme to defraud, did cause to be transmitted by means of wire communications in interstate commerce, certain writings, signs, signals, pictures, and sounds, to wit: a wire communication sent from the Southern District of Mississippi to Nevada via the Internet containing a fraudulent credit application to obtain purchase money for a 2022 Acura MDX.

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNT 3

22. Paragraphs 1 through 21 are hereby re-alleged and incorporated herein by reference.

23. On or about June 14, 2023, in the Northern Division of the Southern District of Mississippi and elsewhere, the defendants, **PAUL ANTHONY ROBINSON** and **SARAH ELIZABETH CALDERON**, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), that is, conspiracy to commit wire fraud and wire

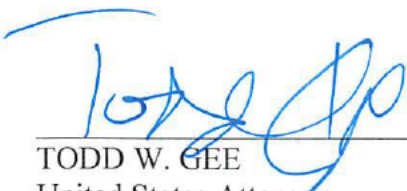
fraud in violation of Title 18 United States Code, Sections 1349 and 1343 as charged in Counts 1 and 2, knowing that the means of identification belonged to another actual person.

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Indictment, the defendants shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses. Further, if any property described above, as a result of any act or omission of the defendants: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendants, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2); and Title 28, United States Code, Section 2461.



TODD W. GEE
United States Attorney

A TRUE BILL:
s/SIGNATURE REDACTED
Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this, the 10th day of April 2024.



UNITED STATES MAGISTRATE JUDGE